

# **ALBERT A. MYERS, III, P.C.**

ATTORNEY AT LAW

884 Green Street, SW  
Conyers, Georgia 30012  
Office (770) 918-9914  
Facsimile (770) 760-7680  
albertamyersiii@hotmail.com

November 15, 2024

SENT VIA CERTIFIED MAIL NUMBER 9589 0710 5270 0281 0825 18  
AND CONFIRMED BY FIRST CLASS MAIL

Oconee River Broadcasting, LLC, assignee of  
Briarpatch Radio, Inc.

C/O Kristopher R. Kendrick, Registered Agent  
259 Turner Street  
Royston, Georgia 30662

RE: Your FM radio tower lease with Mount Calvary Baptist Church on Highway 44,  
Greensboro, Georgia

Dear Mr. Kendrick:

Enclosed is a copy of the Affidavit for Writ of Possession filed today with the Superior Court of Greene County. I have also enclosed checks for July, August, September, and October, 2024 rent because Oconee River Broadcasting, LLC, assignee of Briarpatch Radio, Inc. is a tenant holding over beyond the term of the lease as set forth in my previous correspondence to you.

Any further correspondence regarding the above stated rented premises should be directed to the undersigned.

Oconee River Broadcasting, LLC, assignee of Briarpatch Radio, Inc.

C/O Kristopher R. Kendrick, Registered Agent Letter

RE: Your FM radio tower lease with Mount Calvary Church on Highway 44, Greensboro,  
Georgia

November 15, 2024

Page 2 of 2

Be governed accordingly.

Sincerely Yours,



Albert A. Myers, III

AAM/clp

Enclosures

cc: Mount Calvary Church (with enclosures)

Oconee River Broadcasting, LLC, assignee of Briarpatch Radio, Inc., 1720 Epps Bridge  
Parkway, Suite 108-303, Athens, Georgia 30606 (with enclosures)

**AFFIDAVIT FOR SUMMONS OF DISPOSSESSORY**  
 IN THE SUPERIOR COURT OF GREENE COUNTY  
 STATE OF GEORGIA

Code **RECEIVED IN OFFICE**  
**CLERK OF SUPERIOR COURT**  
**GREENE COUNTY, GEORGIA**  
**SUCV2024000279**

Mount Calvary Baptist Church

Plaintiff's Name/Telephone Number

c/o Albert A. Myers, III, Attorney at Law (770) 918-9914

Plaintiff's Address

884 Green St, SW, Conyers, GA 30012

Case No.

NOV 15, 2024 02:41 PM

Deborah D. Jackson  
Deborah Jackson, Clerk  
 Greene County, Georgia

vs.

Oconee Communications Co. LLC assignee of Briarpatch Radio, Inc.

Defendant's Name

5601 Lake Oconee Parkway, Greensboro, Greene County, Georgia 30642

c/o Kristopher Kendrick, Registered Agent, 259 Turner Street, Royston, Franklin County, Georgia 30662

Defendant's Address

**AFFIDAVIT FOR SUMMONS OF DISPOSSESSORY**

Personally appeared Albert A. Myers, III who upon oath says that he is attorney for the owner of said premises, and that Defendant is in possession as a tenant of premises at the above address in Greene County.

Further Tenant:

- (a) fails to pay the rent which is now past due.
- (b) holds the premises over and beyond the term for which they were rented or leased to them, or
- (c) \_\_\_\_\_

(d) plaintiff is entitled to recover any and all rent that may come due until this action is finally concluded.

Plaintiff desires and has demanded possession of the premises and Defendant has failed and refused to deliver said possession. Defendant has acted in bad faith, been stubbornly litigious and caused Plaintiff unnecessary expense and delay thereby entitling the Plaintiff to an award of reasonable attorney fees.

WHEREFORE, Plaintiff DEMANDS:

(a) possession of the premises; (b) rent accruing up to the date of judgment of vacancy at the rate of \$1,800.00 per month; (d) plus court costs and reasonable attorney's fees.

Sworn to and subscribed before me,

this 15th day of November, 2024

Carrie Lynn Pilgrim  
**NOTARY PUBLIC**

Clerk/Judge/Notary Public

Flockdale County, GEORGIA

SUMMONS  
My Commission Expires 07/16/2025

Albert A. Myers, III

Albert A. Myers, III, Attorney at Law, Affiant  
 Georgia Bar Number 002710

TO: The Constable of the State Court or Sheriff or his Deputies of said County

GREETING:

The defendant herein is commanded and required personally or by attorney to answer orally or in writing, to the Judge or Clerk of Greene County Superior Court, Civil Division, 113 N. Main Street, #109, Greensboro, Georgia, between the hours of 8:30 am and 4:30 pm on or before the **SEVENTH** day from the date of service of the within affidavit and summons (or on the first business day thereafter IF the seventh day falls on Saturday, Sunday or legal Holiday). If the answer is **NOT** made, a Writ of Possession shall issue instantaneously and judgment shall be granted as demanded by the Plaintiff named herein. The last day to answer shall be \_\_\_\_\_, 2024.

Witness Superior Judge, \_\_\_\_\_ of said Court.

This \_\_\_\_\_ day of \_\_\_\_\_, 2024.

Clerk/Judge

**WRIT OF POSSESSION**

GEORGIA, GREENE COUNTY

It appearing to the Court that the Defendant Oconee Communications Co. LLC assignee of Briarpatch Radio, Inc. was duly served Summons of Dispossessory. The Court finds as follows: [ ] no answer was filed; [ ] this action was called for a trial and the Defendants answered but failed to appear for trial; [ ] this action was called for trial and judgment and a writ of possession was granted in favor of the Plaintiff; or [ ] the parties entered into a consent judgment and the Plaintiff demonstrated by affidavit that the Defendants defaulted on same.

**IT IS HEREBY ORDERED AND ADJUDGED**, that the Lawful Officer of said County remove said Defendants and all other occupants, instanter, together with their property found thereon from said house and premises and to immediately deliver full and quiet possession of same to the Plaintiff herein.

Dated at \_\_\_\_\_ Georgia, this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

---

Superior Court Judge

**RETURN OF CONSTABLE OR DEPUTY SHERIFF**

GEORGIA, ROCKDALE COUNTY

I have this day served the Defendant Oconee Communications Co. LLC assignee of Briarpatch Radio, Inc. with a copy of the Affidavit and Summons.

This \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_.

---

Deputy Sheriff

---

Constable

GEORGIA, GREENE COUNTY

I have this day served the Defendants with a copy of the foregoing Affidavit and Summons by delivering a copy of same to a person sui juris residing on the premises designated in said Affidavit, said copy containing notice to the defendant to answer on \_\_\_\_\_, 20\_\_\_\_ at the hour and place stated in the Summons.

This \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_.

---

Deputy Sheriff

---

Constable

**ANSWER OF DEFENDANT**

This \_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_. Defendant

**SUPERIOR COURT OF GREENE COUNTY  
STATE OF GEORGIA**

CIVIL ACTION NUMBER SUCV2024000279  
Mount Calvary Baptist Church

**PLAINTIFF**

VS.

Oconee Communications Co. LLC

**DEFENDANT**

**SUMMONS**

TO: OCONEE COMMUNICATIONS CO. LLC

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

**Albert A Myers, III  
Albert A. Myers PC  
884 Green St SW  
Conyers, Georgia 30012**

an answer to the complaint which is herewith served upon you, within 7 days after service of this summons upon you, exclusive of the day of service. If this action pertains to a Protective Order, the Answer is to be filed and served on or before the scheduled hearing date attached. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

TO THE ABOVE NAMED DEFENDANT:

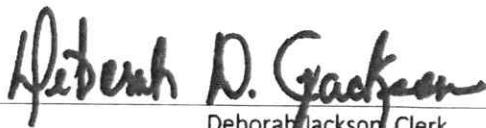
The Defendant(s) herein are hereby commanded and required personally or by attorney to file with **The Clerk of The Superior Court of Greene County, 113 North Main Street, Suite 109, Greensboro, Georgia 30642** within seven (7) days from the date of service of the within Affidavit and Summons, or on the first business day thereafter if the seventh (7th) day falls on a Saturday, Sunday, or a legal holiday, then and there to answer said Affidavit in writing. If the Defendant(s) fail to answer on or before the seventh (7th) day from the date of service, the Defendant(s) may reopen the default as a matter of right by making answer within seven (7) days after the date of the default notwithstanding the provision of Code Section 9-11-55 of the Official Code of Georgia Annotated. If the seventh (7th) day is a Saturday, Sunday, or a legal holiday, the answer may be made on the next day which is not a Saturday, Sunday, or a legal holiday. The last possible date on which the Defendant(s) may answer is the \_\_\_\_\_ day of \_\_\_\_\_ . If an answer is not so made, a Writ of Possession shall issue against you as by law provided, pursuant to Plaintiff's Affidavit.

**SUPERIOR COURT OF GREENE COUNTY  
STATE OF GEORGIA**

Witness the Honorable \_\_\_\_\_, Judge of Said Court.

This 15th day of November, 2024.

Clerk of Superior Court



Deborah Jackson, Clerk  
Greene County, Georgia

**Account: WDDK-FM**

DOCUMENT CONTAINS COLORED BACKGROUND ON WHITE PAPER. "VOID" FEATURE, SIMULATED WATERMARK (REVERSE SIDE) MICRO-PRINT BORDER.

PLEASE POST THIS PAYMENT FOR OUR MUTUAL CUSTOMER

**\$678.31**

-156/531

OCONEE COMMUNICATIONS COMPANY, LLC  
259 Turner St.  
Royston, GA 30662-3920

Please Direct Any Questions To

877-246-7923

Payment Processing Center

P.O. Box 74618

Chicago, IL 60675-4618

WELLS FARGO BANK, NA

04382 4428975 004394 004394 0001/0001 k004382

**0067268578****October 07, 2024**Pay **SIX HUNDRED SEVENTY EIGHT AND 31/100****DOLLARS**TO MY CALVARY BAPTIST CHURCH  
THE PO BOX 1024  
ORDER GREENSBORO, GA 30642-8024

04382

\$ \*\*\*\*\*678.31

REMITTANCE VOID IF NOT CASHED WITHIN 90 DAYS.



AUTHORIZED SIGNATURE

WARNING: THIS BORDER CONTAINS MICRO-TYPE WHICH WILL NOT REPRODUCE ON A COPIER.

\*\*0067268578\*\* 10531015611 8018775539\*\*

**Account: WDDK-FM**

DOCUMENT CONTAINS COLORED BACKGROUND ON WHITE PAPER. "VOID" FEATURE, SIMULATED WATERMARK (REVERSE SIDE) MICRO-PRINT BORDER.

PLEASE POST THIS PAYMENT FOR OUR MUTUAL CUSTOMER

**\$678.31**

-156/531

OCONEE COMMUNICATIONS COMPANY, LLC  
259 Turner St.  
Royston, GA 30662-3920Please Direct Any Questions To  
877-246-7923  
Payment Processing Center  
P.O. Box 74618  
Chicago, IL 60675-4618**0061814855****September 03, 2024**Pay **SIX HUNDRED SEVENTY EIGHT AND 31/100****DOLLARS**TO MY CALVARY BAPTIST CHURCH  
THE PO BOX 1024  
ORDER GREENSBORO, GA 30642-8024

07349

\$ \*\*\*\*\*678.31

REMITTANCE VOID IF NOT CASHED WITHIN 90 DAYS.



AUTHORIZED SIGNATURE

WARNING: THIS BORDER CONTAINS MICRO-TYPE WHICH WILL NOT REPRODUCE ON A COPIER.

\*\*0061814855\*\* 10531015611 8018775539\*\*

**Account: WDDK-FM**

DOCUMENT CONTAINS COLORED BACKGROUND ON WHITE PAPER. "VOID" FEATURE, SIMULATED WATERMARK (REVERSE SIDE) MICRO-PRINT BORDER.

PLEASE POST THIS PAYMENT FOR OUR MUTUAL CUSTOMER

**\$678.31**

-156/531

OCONEE COMMUNICATIONS COMPANY, LLC  
259 Turner St.  
Royston, GA 30662-3920Please Direct Any Questions To  
877-246-7923  
Payment Processing Center  
P.O. Box 74618  
Chicago, IL 60675-4618**0056713542****August 01, 2024**Pay **SIX HUNDRED SEVENTY EIGHT AND 31/100****DOLLARS**TO MY CALVARY BAPTIST CHURCH  
THE PO BOX 1024  
ORDER GREENSBORO, GA 30642-8024

08460

\$ \*\*\*\*\*678.31

REMITTANCE VOID IF NOT CASHED WITHIN 90 DAYS.



AUTHORIZED SIGNATURE

WARNING: THIS BORDER CONTAINS MICRO-TYPE WHICH WILL NOT REPRODUCE ON A COPIER.

\*\*0056713542\*\* 10531015611 8018775539\*\*

DOCUMENT CONTAINS COLORED BACKGROUND ON WHITE PAPER. "VOID" FEATURE, SIMULATED WATERMARK (REVERSE SIDE) MICRO-PRINT BORDER.

**Account: WDDK-FM**

**PLEASE POST THIS PAYMENT FOR OUR MUTUAL CUSTOMER**

**\$678.31**

Please Direct Any Questions To  
877-246-7923  
Payment Processing Center  
P.O. Box 74618  
Chicago, IL 60675-4618

07682 7748863 007694 00010001 K007682

WELL'S FARGO BANK, NA

**July 01, 2024**

**0051662630**

TO  
THE  
ORDER  
OF

MY CALVARY BAPTIST CHURCH  
PO BOX 1024  
GREENSBORO, GA 30642-8024

07682

DOLLARS

\$\*\*\*\*\***678.31**

REMITTANCE VOID IF NOT CASHED WITHIN 90 DAYS.

*[Signature]*

AUTHORIZED SIGNATURE

WARNING: THIS BORDER CONTAINS MICRO-TYPE WHICH WILL NOT REPRODUCE ON A COPIER.

"0051662630" "053101561" "8018775537"